

SDMS DocID

559350

TAYLOR, KEANE, BLANCHARD, LYONS, TYBURSKY & WATSON, P.A.

ATTORNEYS AT LAW

ALVIN E TAYLOR
THOMAS M. KEANE
RAYMOND P. BLANCHARD
JOHN E. LYONS, JR.*
STEPHEN J. TYBURSKY*
THOMAS R. WATSON*
MARY DRISCOLL PEYSER*

Superfund Records Center SITE: (Oakley BREAK: 119 OTHER: 559350

August 19, 1988

ELDREDGE PARK CATE STREET P. O. BOX 477 PORTSMOUTH, N.H. 03801

TEL. 603-436-6500 TEL. 603-431-4266 FAX. 603-431-4643

*ADMITTED IN NH & ME

RECEIVED AUG 2 2 1988

Mr. Paul Marchessault U. S. Environmental Protection Agency Post Office Box 3409 Reston, Virginia 22091

Re: Coakley Landfill/Coast Pontiac-Cadillac, Inc.

Dear Sir:

In accordance with the demand contained in a letter dated August 9, 1988 to my client, Coast Pontiac-Cadillac, Inc., makes the response herewith enclosed.

Very truly yours

Raymond P. Blanchard

RPB:bq enclosure

cc: Mr. Joseph Yergeau

ANSWERS TO REQUESTS

- 1. Joseph R. Yergeau
- No other person was consulted.
- 3. No documents were consulted.
- 4. No other employee who would be more knowledgeable than Mr. Yergeau.
- 5. No persons are known to have direct knowledge, that is, other than what has been reported in the press.
 - 6. Not applicable.
 - 7. Not applicable.
- 8. Coast Pontiac-Cadillac, Inc., Route 1 By-Pass, Portsmouth, New Hampshire 03801; Paul J. Holloway, Jr., 80 Front Street, Exeter, New Hampshire 03833; President and Chairman of the Board. No other corporate names have been employed.
 - 9. Not applicable.
- 10. That corporation is incorporated in the State of New Hampshire, is doing business in New Hampshire and may be served in accordance with New Hampshire Law at its place of business.
 - 11. Sales and service of new and used automobiles.
- 12. Respondent is insured with the Hartford Insurance Company on a garage liability policy purchased through the Dunfey Agency of Hampton, New Hampshire with liability limits of \$1,000,000.00 and with a pollution exclusion clause.

Note that Coast Pontiac-Cadillac, Inc. was formed in February of 1983 and commenced operations in that month. Respondent believes and therefore avers that the Coakley Landfill site was closed in the Summer of 1982.

- 14. No.
- 15. No.